UNITED STATES DISTRICT COURT

for the

	Easter	n District of Te	ennessee	
	Jon Howard Rowland Plaintiff V. The Strayer University Corporation Defendant)))))))	Civil Action No.	3:13-cv-702-PLR-HBG
	SUBPOENA TO PRODUCE I			
	OR TO PERMIT INSPEC	TION OF PRE	EMISES IN A CIV	/IL ACTION
To:	Brother Corporation	n; 7777 N. Brot	her Blvd; Bartlett, 1	ΓN 38133
	(Name of p	verson to whom thi	is subpoena is directed)
material:	nts, electromically stored information, or ob See attached Exhibit A.	,		
	Littler Mendelson, P.C. 3725 Champion Hills Drive; Suite 3000		Date and Time:	
	Memphis, TN 38125		1	1/26/2014 10:00 am
other pro	Inspection of Premises: YOU ARE COM perty possessed or controlled by you at the ect, measure, survey, photograph, test, or	e time, date, an	d location set forth	below, so that the requesting party
Rule 45(The following provisions of Fed. R. Civ. Pd), relating to your protection as a person sto this subpoena and the potential consequent 11/13/2014	subject to a sub	poena; and Rule 4	
	CLERK OF COURT			
			OR	s/Rodrick D. Holmes
	Signature of Clerk or	Deputy Clerk	******	Attorney's signature
	e, address, e-mail address, and telephone re er University Corporation	umber of the a		es or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:13-cv-702-PLR-HBG

PROOF OF SERVICE

(This sec	tion should not be filed with the cour	t unless required by Fed. R. Civ. P. 45.)
I received this sub	ppoena for (name of individual and title, if a	<i>w</i>	
n (date)			
1 served the sul	bpoena by delivering a copy to the nar	ned person as follows:	-74
		on (date)	or
	ubpoena unexecuted because:		
	na was issued on behalf of the United	States, or one of its officers or agents, I	have also
tendered to the wi	tness the fees for one day's attendance	e, and the mileage allowed by law, in the	c amount or
•	tness the fees for one day's attendance	e, and the mileage allowed by law, in the	c amount of
\$	•		0.00
y fees are \$	<u> </u>	for services, for a total of \$	
s	for travel and \$	for services, for a total of \$	
\$	for travel and \$	for services, for a total of \$	
\$	for travel and \$	for services, for a total of \$s true.	
\$	for travel and \$	for services, for a total of \$s true. Server's signature	

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection nuless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. Ou timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rnle 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quasbing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpocuaed person will be reasonably compensated.

(e) Duties iu Responding to a Subpoeua.

- Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information;
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The persou responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenacd information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate exense to obey the subpoena or an order related to it.

JON HOWARD ROWLAND v. THE STRAYER UNIVERSITY CORPORATION

All employment related documents and records, including but not limited to, the entire personnel file for Jon Howard Rowland¹ including records held by human resources, managers and/or supervisors related to his hiring, payroll records, counseling, discipline, demotions, promotions, attendance, timecards, vacation and leave requests, and separation from employment. Records containing personal identifying financial information (i.e. direct deposit and bank accounts, etc.) and medical records need not be produced.

It is not necessary that an individual attend and produce the requested records in person. Please prepare a copy of the records requested, complete the attached Affidavit of Custodian of Records and send the records to the attorney on the subpoena in time to arrive on the date and time requested on the subpoena.

¹ It is the policy of Littler Mendelson, P.C. to protect individuals' personal identifying information such as social security numbers and dates of birth. If a full social security number and/or date of birth is required to properly identify this individual, please call Vickie Jones, Paralegal, Littler Mendelson, P.C., at 901-322-1249, to verbally obtain the information.

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

JON HOWARD ROWLAND	
Plaintiff,)) Case No. 3:13-cv-702-PLR-HBG
v.))
THE STRAYER UNIVERSITY CORPORATION)))
Defendant.	
	,)
)
<u>AFFIDAVIT (</u>	OF CUSTODIAN
COMES NOW, before the undersigned	ed officer duly authorized by law to administer
oaths, the undersigned Affiant, who, after being	duly sworn, states as follows:
1. My name is	I am over
the age of 18 years and am competent to make t	this Affidavit.
2. I am the custodian of records ma	aintained by
and/or I have authority to certify to the authenti	city of such records.
3. Pursuant to the Subpoena served	l upon,
I have reviewed our records and files and have	e determined that the documents attached to this
Affidavit constitute true and accurate copies of	all files, records and other documents responsive
to the Subpoena received in the above-styled ca	Se.
. 4. These records were prep	ared by the personnel and staff of
, or person	acting under the control of this organization, in
the ordinary course of our business.	

	AFFIANT (Signature)	
STATE OF		
COUNTY OF		
Sworn to and subscribed before me, this day of, 2014.		
Notary Public		
My Commission Expires:		
[SEAL] Firmwide:124133566,1 061931,1040		

United States District Court for the Eastern District of Tennessee Jon Howard Rowland Plaintiff Civil Action No. 3:13-cv-702-PLR-HBG v. The Strayer University Corporation Defendant SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION Ideal Chemical; 4025 Air Park Street; Memphis, TN 38118 To: (Name of person to whom this subpoena is directed) **Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material: See attached Exhibit A. Date and Time: Place: Littler Mendelson, P.C. 3725 Champion Hills Drive; Suite 3000 11/26/2014 10:00 am Memphis, TN 38125 ☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it. Date and Time: Place: The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so. 11/13/2014 Date: CLERK OF COURT OR

The Strayer University Corporation , who issues or requests this subpoena, are:

Signature of Clerk or Deputy Clerk

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Notice to the person who issues or requests this subpoena

s/Rodrick D. Holmes

Attorney's signature

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

AO 88B (Rev. 02/14) Subpoca to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2) Civil Action No. 3:13-cv-702-PLR-HBG PROOF OF SERVICE (This section should not be filed with the court unless required by Fed. R. Civ. P. 45.) I received this subpoena for (name of individual and title, if any) on (date) ☐ I served the subpoena by delivering a copy to the named person as follows: on (date) ; or ☐ I returned the subpoena unexecuted because: Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of for travel and \$ _____ for services, for a total of \$ My fees are \$ 0.00 I declare under penalty of perjury that this information is true. Date: Server's signature Printed name and title

Additional information regarding attempted service, etc.:

Server's address

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
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 - (i) fails to allow a reasonable time to comply;
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(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information nnder a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld doenments, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

JON HOWARD ROWLAND v. THE STRAYER UNIVERSITY CORPORATION

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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

JON HOWARD ROWLAND	<i>)</i>
Plaintiff,) Case No. 3:13-cv-702-PLR-HBG
THE STRAYER UNIVERSITY CORPORATION)))
Defendant.)
))
)
<u>AFFIDAVIT (</u>	OF CUSTODIAN
COMES NOW, before the undersigned	ed officer duly authorized by law to administer
oaths, the undersigned Affiant, who, after being	g duly sworn, states as follows:
1. My name is	I am over
the age of 18 years and am competent to make	this Affidavit.
2. I am the custodian of records ma	aintained by
and/or I have authority to certify to the authenti	icity of such records.
3. Pursuant to the Subpoena served	d upon,
I have reviewed our records and files and hav	re determined that the documents attached to this
Affidavit constitute true and accurate copies of	fall files, records and other documents responsive
to the Subpoena received in the above-styled ca	ase.
4. These records were prep	pared by the personnel and staff of
, or person	n acting under the control of this organization, in
the ordinary course of our business.	

	AFFIANT (Signature)	
STATE OF		
COUNTY OF		
Sworn to and subscribed before me, this, 2014.		
Notary Public	•	
My Commission Expires:		
[SEAL]		
Firmwide:124133566.1 061931.1040		

UNITED STATES DISTRICT COURT

for the

ior the	
Eastern District of T	ennessee
Jon Howard Rowland Plaintiff v. The Strayer University Corporation Defendant)	Civil Action No. 3:13-cv-702-PLR-HBG
SUBPOENA TO PRODUCE DOCUMENTS OR TO PERMIT INSPECTION OF PR	
To: Kavland; 6330 Macon Road	d; Memphis, TN 38134
(Name of person to whom th	is subpoena is directed)
**Production: YOU ARE COMMANDED to produce at t documents, electronically stored information, or objects, and to p material: See attached Exhibit A.	
Place: Littler Mendelson, P.C.	Date and Time:
3725 Champion Hills Drive; Suite 3000 Memphis, TN 38125	11/26/2014 10:00 am
☐ Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, are may inspect, measure, survey, photograph, test, or sample the pro-	nd location set forth below, so that the requesting party
Place:	Date and Time:
The following provisions of Fed. R. Civ. P. 45 are attached Rule 45(d), relating to your protection as a person subject to a subject to a subject to this subpoena and the potential consequences of not decomposed by the control of t	OR s/Rodrick D. Holmes
Signature of Clerk or Deputy Clerk	Attorney's signature
The name, address, e-mail address, and telephone number of the a	attorney representing (name of party), who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:13-cv-702-PLR-HBG

	PROOF OF SEI	RVICE	
(This sec	ction should not be filed with the court	unless required by Fed. R. Civ. P. 45	i.)
I received this sul	bpoena for (name of individual and title, if any)	
on (date)			
☐ 1 served the su	abpoena by delivering a copy to the nam	ed person as follows:	
		on (date)	; or
☐ 1 returned the	subpoena unexecuted because:		
tendered to the w	ena was issued on behalf of the United S itness the fees for one day's attendance,		
\$	· ·		
My fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under po	enalty of perjury that this information is	true. Server's signature	
		Printed name and title	
		Server's address	
Additional information re	garding attempted service, etc.:		

(e) Place of Compliance.

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- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
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- (B) Information Produced. If information produced in response to a snhpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it hefore being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the elaim. The person who produced the information must preserve the information until the elaim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to oney the subpoena or an order related to it.

JON HOWARD ROWLAND v. THE STRAYER UNIVERSITY CORPORATION

All employment related documents and records, including but not limited to, the entire personnel file for Jon Howard Rowland¹ including records held by human resources, managers and/or supervisors related to his hiring, payroll records, counseling, discipline, demotions, promotions, attendance, timecards, vacation and leave requests, and separation from employment. Records containing personal identifying financial information (i.e. direct deposit and bank accounts, etc.) and medical records need not be produced.

It is not necessary that an individual attend and produce the requested records in person. Please prepare a copy of the records requested, complete the attached Affidavit of Custodian of Records and send the records to the attorney on the subpoena in time to arrive on the date and time requested on the subpoena.

¹ It is the policy of Littler Mendelson, P.C. to protect individuals' personal identifying information such as social security numbers and dates of birth. If a full social security number and/or date of birth is required to properly identify this individual, please call Vickie Jones, Paralegal, Littler Mendelson, P.C., at 901-322-1249, to verbally obtain the information.

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

JON HOWARD ROWLAND)
Plaintiff, v.) Case No. 3:13-cv-702-PLR-HBG
THE STRAYER UNIVERSITY CORPORATION)))
Defendant.	ý)))
<u>AFFIDAVIT</u>	OF CUSTODIAN
COMES NOW, before the undersigned	ed officer duly authorized by law to administer
oaths, the undersigned Affiant, who, after being	g duly sworn, states as follows:
1. My name is	I am over
the age of 18 years and am competent to make	this Affidavit.
2. I am the custodian of records ma	aintained by
and/or I have authority to certify to the authenti	city of such records.
3. Pursuant to the Subpoena served	d upon,
I have reviewed our records and files and hav	re determined that the documents attached to this
Affidavit constitute true and accurate copies of	fall files, records and other documents responsive
to the Subpoena received in the above-styled ca	ise.
. 4. These records were prep	pared by the personnel and staff of
, or person	n acting under the control of this organization, in
the ordinary course of our business.	

	AFFIANT (Signature)	
STATE OF		
COUNTY OF		
Sworn to and subscribed before me, this, 2014.		
Notary Public	•	
My Commission Expires:		
[SEAL]		
Firmwide:124133566.1 061931.1040		

United States District Court

	for the		
	Eastern District of T	Tennessee	
The Strayer U	oward Rowland Plaintiff v. University Corporation Defendant)	Civil Action No.	3:13-cv-702-PLR-HBG
	POENA TO PRODUCE DOCUMENT OR TO PERMIT INSPECTION OF PR	,	•
То:	Mark VII Transportation; 965 Ridge Lake	Blvd; Suite 103; Me	emphis, TN 38120
	(Name of person to whom to	his subpoena is directed)
documents, electronical material: See attached	DU ARE COMMANDED to produce at lly stored information, or objects, and to particular to particular A.	the time, date, and permit inspection, c	place set forth below the following opying, testing, or sampling of the
Place: Littler Mendelso	on P.C	Date and Time:	
	n Hills Drive; Suite 3000	1	1/26/2014 10:00 am
other property possesse	remises: YOU ARE COMMANDED to d or controlled by you at the time, date, a survey, photograph, test, or sample the pro-	nd location set fortl	below, so that the requesting party
Place:		Date and Time:	
Rule 45(d), relating to y	provisions of Fed. R. Civ. P. 45 are attach your protection as a person subject to a su a and the potential consequences of not d	bpoena; and Rule 4	
	CLERK OF COURT		
		OR	s/Rodrick D. Holmes
	Signature of Clerk or Deputy Clerk	MW/	Attorney's signature
		-	
	ail address, and telephone number of the		
The Strayer University C	orporation	, who issu	es or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:13-cv-702-PLR-HBG

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

1 (date)	·		
☐ I served the sul	ppoena by delivering a copy to the nan	ned person as follows:	A27
		on (date)	; or
☐ I returned the s	ubpoena unexecuted because:		
tendered to the wi		States, or one of its officers or agents, and the mileage allowed by law, in the	
y fees are \$	for travel and \$	for services, for a total of \$	0.00
	nalty of perjury that this information is	s true.	
I declare under pe			
·			
·		Server's signature	
·		Server's signature Printed name and title	
·			

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpocna may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person, and
- (B) inspection of premises at the premises to be inspected.

(d) Proteeting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue bardship; and
 - (ii) eusnres that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the eategories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a elaim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the elaim and the basis for it. After being notified, a party must prouptly return, sequester, or destroy the specified information and any eopies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the elaim is resolved.

(g) Contempt.

The court for the district where complianed is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

JON HOWARD ROWLAND v. THE STRAYER UNIVERSITY CORPORATION

All employment related documents and records, including but not limited to, the entire personnel file for Jon Howard Rowland¹ including records held by human resources, managers and/or supervisors related to his hiring, payroll records, counseling, discipline, demotions, promotions, attendance, timecards, vacation and leave requests, and separation from employment. Records containing personal identifying financial information (i.e. direct deposit and bank accounts, etc.) and medical records need not be produced.

It is not necessary that an individual attend and produce the requested records in person. Please prepare a copy of the records requested, complete the attached Affidavit of Custodian of Records and send the records to the attorney on the subpoena in time to arrive on the date and time requested on the subpoena.

¹ It is the policy of Littler Mendelson, P.C. to protect individuals' personal identifying information such as social security numbers and dates of birth. If a full social security number and/or date of birth is required to properly identify this individual, please call Vickie Jones, Paralegal, Littler Mendelson, P.C., at 901-322-1249, to verbally obtain the information.

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

JON HOWARD ROWLAND)
Plaintiff,)) Case No. 3:13-cv-702-PLR-HBG)
THE STRAYER UNIVERSITY CORPORATION)))
Defendant.))
,	,
<u>AFFIDAVIT (</u>	OF CUSTODIAN
COMES NOW, before the undersigne	ed officer duly authorized by law to administer
oaths, the undersigned Affiant, who, after being	g duly sworn, states as follows:
1. My name is	. I am over
the age of 18 years and am competent to make t	
-	aintained by
and/or I have authority to certify to the authentic	
	l upon,
•	
	e determined that the documents attached to this
Affidavit constitute true and accurate copies of	all files, records and other documents responsive
to the Subpoena received in the above-styled car	se
. 4. These records were prepare	ared by the personnel and staff of
, or persor	acting under the control of this organization, in
the ordinary course of our business.	

	AFFIANT (Signature)	
STATE OF		
COUNTY OF		
Sworn to and subscribed before me,		
this day of, 2014.		
Notary Public		
My Commission Expires:		
[SEAL]		

United States District Court

for the

Eastern Di	strict of Tennessee
Jon Howard Rowland Plaintiff v. The Strayer University Corporation Defendant) Civil Action No. 3:13-cv-702-PLR-HBG))
	UMENTS, INFORMATION, OR OBJECTS N OF PREMISES IN A CIVIL ACTION
To: Union Planters Bank; 7130 Ge	oodlett Farms Parkway; Cordova, TN 38016
(Name of person	to whom this subpoena is directed)
Production: YOU ARE COMMANDED to predocuments, electronically stored information, or objects material: See attached Exhibit A.	oduce at the time, date, and place set forth below the following s, and to permit inspection, copying, testing, or sampling of the
Place: Littler Mendelson, P.C.	Date and Time:
3725 Champion Hills Drive; Suite 3000 Memphis, TN 38125	11/26/2014 10:00 am
other property possessed or controlled by you at the tim	NDED to permit entry onto the designated premises, land, or the, date, and location set forth below, so that the requesting party ole the property or any designated object or operation on it.
Place:	Date and Time:
	are attached – Rule 45(c), relating to the place of compliance; ect to a subpoena; and Rule 45(e) and (g), relating to your duty to s of not doing so.
Date:11/13/2014	
CLERK OF COURT	OR s/Rodrick D. Holmes
Signature of Clerk or Deput	
The name, address, e-mail address, and telephone numb The Strayer University Corporation	per of the attorney representing (name of party), who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:13-cv-702-PLR-HBG

PROOF OF SERVICE

		CRVICE	
(This sec	ction should not be filed with the cour	t unless required by Fed. R. Civ. P. 45	i.)
I received this su	bpoena for (name of individual and title, if ar	ıy)	
n (date)	·		
☐ I served the su	ubpoena by delivering a copy to the nam	ned person as follows:	
		on (date)	; or
☐ I returned the	subpoena unexecuted because:		
	ena was issued on behalf of the United itness the fees for one day's attendance		
\$	·		
ly fees are \$	for travel and \$	for services, for a total of \$	0.00
	for travel and \$enalty of perjury that this information is		0.00
I declare under pe		s true.	0.00
I declare under pe			0.00
My fees are \$ I declare under pe		s true.	0.00
I declare under pe		s true. Server's signature	0.00

(e) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must proteet a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Snbpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
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- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information nnder a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the elaim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a suhpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not nse or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

JON HOWARD ROWLAND v. THE STRAYER UNIVERSITY CORPORATION

All employment related documents and records, including but not limited to, the entire personnel file for Jon Howard Rowland¹ including records held by human resources, managers and/or supervisors related to his hiring, payroll records, counseling, discipline, demotions, promotions, attendance, timecards, vacation and leave requests, and separation from employment. Records containing personal identifying financial information (i.e. direct deposit and bank accounts, etc.) and medical records need not be produced.

It is not necessary that an individual attend and produce the requested records in person. Please prepare a copy of the records requested, complete the attached Affidavit of Custodian of Records and send the records to the attorney on the subpoena in time to arrive on the date and time requested on the subpoena.

¹ It is the policy of Littler Mendelson, P.C. to protect individuals' personal identifying information such as social security numbers and dates of birth. If a full social security number and/or date of birth is required to properly identify this individual, please call Vickie Jones, Paralegal, Littler Mendelson, P.C., at 901-322-1249, to verbally obtain the information.

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

JON HOWARD ROWLAND)
Plaintiff, v.) Case No. 3:13-cv-702-PLR-HBG
THE STRAYER UNIVERSITY CORPORATION)))
Defendant.)))
<u>AFFIDAVIT</u>	OF CUSTODIAN
COMES NOW, before the undersign	ned officer duly authorized by law to administer
oaths, the undersigned Affiant, who, after being	ng duly sworn, states as follows:
1. My name is	I am over
the age of 18 years and am competent to make	e this Affidavit.
2. I am the custodian of records r	maintained by
and/or I have authority to certify to the authen	nticity of such records.
3. Pursuant to the Subpoena serve	ed upon,
I have reviewed our records and files and ha	ave determined that the documents attached to this
Affidavit constitute true and accurate copies of	of all files, records and other documents responsive
to the Subpoena received in the above-styled o	case.
-	epared by the personnel and staff of
the ordinary course of our business.	on average ender the control of the organization, in

	AFFIANT (Signature)	
STATE OF		
COUNTY OF		
Sworn to and subscribed before me,		
this, 2014.		
Notary Public	•	
My Commission Expires: [SEAL]		
Firmuida (24)22664 1 061021 1040		

UNITED STATES DISTRICT COURT for the Eastern District of Tennessee

Jon Howard Rowland			
Plaintiff)		
ν.)	Civil Action No.	3:13-cv-702-PLR-HBG
The Strayer University Corporation)		
)		
Defendant)		

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: University of Memphis; 3720 Alumni Avenue; Memphis, TN 38152

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the inaterial: See attached Exhibit A.

Place: Littler Mendelson, P.C.	Date and Time:
3725 Champion Hills Drive; Suite 3000 Memphis, TN 38125	11/26/2014 10:00 am

☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _	11/13/2014	_			
		CLERK OF COURT			
			OR		
				s/Rodrick D. Holmes	
		Signature of Clerk or Deputy Clerk		Attorney's signature	

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

The Strayer University Corporation , who issues or requests this subpoena, are:

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:13-cv-702-PLR-HBG

PROOF OF SERVICE

(This sec	tion should not be filed with the cou	rt unless required by Fed. R. Civ. P. 45.)
I received this sul	ppoena for (name of individual and title, if a	any)	
on (date)	·		
☐ I served the su	bpoena by delivering a copy to the na	amed person as follows:	<u>.</u>
		on (date)	; or
	subpoena unexecuted because:		-
tendered to the wi	itness the fees for one day's attendance	d States, or one of its officers or agents, lee, and the mileage allowed by law, in the	
\$ My fees are \$	for traval and \$	for services, for a total of \$	0.00
Date:	enalty of perjury that this information		
		Server's signature	
		Printed name and title	
		Server's address	
Additional information re	garding attempted service, etc.:		
·			

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is eommanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may eommand:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required mnst enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, eopying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electromically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply heyond the geographical limits specified in Rule 45(e);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the eircumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(c) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and lahel them to correspond to the eategories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sonrces that the person identifies as not reasonably accessible because of unduc burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of nndne burden or cost. If that showing is made, the court may nonetheless order discovery from such sonrces if the requesting party shows good canse, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the elaim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issning court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

JON HOWARD ROWLAND v. THE STRAYER UNIVERSITY CORPORATION

All employment related documents and records, including but not limited to, the entire personnel file for Jon Howard Rowland¹ including records held by human resources, managers and/or supervisors related to his hiring, payroll records, counseling, discipline, demotions, promotions, attendance, timecards, vacation and leave requests, and separation from employment. Records containing personal identifying financial information (i.e. direct deposit and bank accounts, etc.) and medical records need not be produced.

It is not necessary that an individual attend and produce the requested records in person. Please prepare a copy of the records requested, complete the attached Affidavit of Custodian of Records and send the records to the attorney on the subpoena in time to arrive on the date and time requested on the subpoena.

¹ It is the policy of Littler Mendelson, P.C. to protect individuals' personal identifying information such as social security numbers and dates of birth. If a full social security number and/or date of birth is required to properly identify this 'individual, please call Vickie Jones, Paralegal, Littler Mendelson, P.C., at 901-322-1249, to verbally obtain the information.

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

JON HOWARD ROWLAND)
Plaintiff,) Case No. 3:13-cv-702-PLR-HBG
v.	,)
THE STRAYER UNIVERSITY CORPORATION)))
Defendant.)
	<i>)</i>)
)
<u>AFFIDAVIT (</u>	OF CUSTODIAN
COMES NOW, before the undersigned	ed officer duly authorized by law to administer
oaths, the undersigned Affiant, who, after being	g duly sworn, states as follows:
1. My name is	I am over
the age of 18 years and am competent to make	this Affidavit.
2. I am the custodian of records ma	aintained by
and/or I have authority to certify to the authenti	city of such records.
3. Pursuant to the Subpoena served	d upon,
I have reviewed our records and files and hav	re determined that the documents attached to this
Affidavit constitute true and accurate copies of	all files, records and other documents responsive
to the Subpoena received in the above-styled ca	ise.
. 4. These records were prep	pared by the personnel and staff of
, or person	n acting under the control of this organization, in
the ordinary course of our business.	

	AFFIANT (Signature)
STATE OF	
COUNTY OF	
	
Sworn to and subscribed before me,	
this day of, 2014.	
Notary Public	
My Commission Expires:	
[SEAL]	
Firmwide:124133566.1 061931.1040	